

October 1, 2018

Ex Parte

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: ET Docket No. 16-56, ET Docket No. 14-165, MB Docket No. 15-146, RM-11745, GN Docket No. 12-268

Dear Ms. Dortch:

On September 27, Brad Smith, President of Microsoft Corporation, Paula Boyd, Senior Director, Government and Regulatory Affairs, Paul Garnett, Senior Director of the Microsoft Airband Initiative, Carol Ann Browne, Director of Communications, Robert McDowell, of Cooley LLP, and I met with Chairman Ajit Pai and Alison Nemeth, Chairman Pai's Legal Advisor. Ms. Boyd, Mr. Garnett, Michael Daum, Microsoft's Director of Technology Policy, Mr. McDowell, and I also met separately with Ms. Nemeth. In these meetings, Microsoft provided an update to the Commission on the Airband Initiative. Through this initiative, Microsoft and rural ISPs across the country are working together to bring broadband access to two million previously unserved Americans by 2022, using White Spaces technology. Microsoft and its partners are well on their way to achieving this goal with deployments in 18 states which are projected to cover 750,000 rural, unserved Americans with broadband.

To support efforts to expand rural broadband, Microsoft requested that the Commission resolve pending petitions for reconsideration and the White Spaces database accuracy and geolocation proceeding as soon as possible. Microsoft requested that the FCC (1) affirm its existing decision on the size of channel 37 exclusion zones for wireless medical telemetry sites and move forward with permitting White Spaces operations in channel 37 as soon as possible, (2) allow greater antenna heights, (3) replace the existing "push" notification rule, and (4) affirm its decision to allow geolocation of fixed devices through professional installation, or, at a minimum, allow professional installation to establish height because of inaccurate and inconsistent z-axis results in commercial GPS. Microsoft also requested that the Commission consider rule changes to increase gain and power in rural areas with greater separation distances, support the use of White Space frequencies for narrowband IoT, and allow White Spaces devices on moving vehicles in geo-fenced areas using fixed device rules.

Pursuant to the FCC's rules, I have filed a copy of this notice electronically in the above-referenced docket. If you require any additional information, please contact the undersigned.

Sincerely,



Paul Margie
Counsel to Microsoft Corporation

cc: meeting participants